

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

FEDERAL DISTRICT COURT FOR VERMONT

2024 OCT 31 AM 11:34

University of Vermont Students for Justice in Palestine

CLERK  
BY LAW  
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Index 2:24-cv-978

v.

University of Vermont and State Agricultural college, et al

**Tomas Zavalidroga's Reply to Plaintiffs' Attorney's Opposition to Zavalidroga's Motion for Permission to File an Amicus Brief in this Action.**

Tomas Zavalidroga asks that the court disregard Plaintiffs' attorney's opposition to Zavalidroga's Motion for permission to file an Amicus Brief in this action.

First, it is anomalous that any district court in the United States would even require permission to file an Amicus Brief. Most district courts do not require such permission and neither does the U.S. Supreme Court or the 2<sup>nd</sup> Circuit Court of Appeals. For that matter, this local rule seems not to have been official codified and officially entered as part of the Vermont District's general local rules.

Beyond that, it is highly doubtful that any such a requirement by a district court could comport with the 1<sup>st</sup>, 5<sup>th</sup> or 14<sup>th</sup> Amendments.

In his Motion To Intervene, Zavalidroga stated at length his interest in this action, and it should be self-evident that he has reasonable grounds for filing an Amicus Brief.

It also needs to be mentioned that Zavalidroga is the only entity in this action who is an authority on the topics of international law, constitutional law, educational law, current events and Middle-East history. Zavalidroga is also one of the few entities with first-hand knowledge of the facts of this matter.

On the contrary, it is Plaintiffs' Attorney, the Defendant's Attorney, and this court who need to be fully informed of the law, history, and facts of the subject matter involved.

In particular, Plaintiffs' attorney, to best serve his clients and the broader community, could greatly benefit from Zavalidroga's Amicus Brief in support of the Plaintiffs, since the Plaintiffs' Attorney's pleadings are currently marginal in regard to withstanding the general bar to bringing federal action during the pendency of an administrative proceeding. Plaintiffs' Attorney also failed to oppose large portions the Defendants' Motion to Dismiss by invoking 28 USC 1746 to strike those portions of the motion which don't conform to the federal standards of first-hand knowledge and supporting evidence. Also, Plaintiffs' Attorney's foray into the federal courts solely on prospective and injunctive relief grounds brings into question the sustainability of this litigation without additional outside input, and additionally, Plaintiffs' Attorney has neglected to expound on the major issue of American college students' property rights in their physical surroundings, organizations, and general education itself.

Dated: October 26, 2024

Tomas Zavalidroga

*Tomas Zavalidroga*

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UVM Students FOR Justice In Palestine

V.

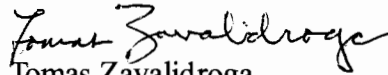
University of Vermont, et al

Tomas Zavalidroga, under penalty of perjury, hereby attests that on Oct. 28<sup>th</sup>, 2024, he mailed true copies of Tomas Zavalidroga's Reply to Plaintiffs' Attorney's opposition To Zavalidroga's Motion for permission to File Amicus Brief, by first class U.S. Mail to the following persons at the listed addresses:

Kendall Hoechst, Esq., Dinse P.C., 209 Battery St., Burlington, VT 05402

John Franco, 110 Main St., ste 208, Burlington, VT 05401

Dated and signed this 28<sup>th</sup> day of October, 2024

  
Tomas Zavalidroga